

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

RYAN-TYRONE MORRIS,

Plaintiff,

v.

SYNCHRONY FINANCIAL,

Defendant.

Case No. 24-cv-207

Removal from Circuit Court Stafford County,
Case No.: 179CL2300363200

**CERTIFICATION IN SUPPORT OF
REMOVAL**

I, Amy Sector, Esq. hereby certify:

1. I am an attorney admitted to practice before the Courts of the State of Virginia and an attorney with the law firm of Reed Smith LLP, counsel for Defendant Synchrony Bank sued herein as Synchrony Financial (“Synchrony”) in the above-captioned matter. I make this Certification in support of Synchrony’s Notice of Removal.

2. I have personal knowledge of the facts set forth herein.

3. On October 31, 2023, Ryan-Tyrone Morris (“Plaintiff”) commenced this action in the Circuit Court, Stafford County as Case No. 179CL230036320 (“State Court Action”) by filing a “Notice of Default”. A true and correct copy of the Notice of Default is attached hereto as **Exhibit 1**.

4. Thereafter, Plaintiff filed an Amended Complaint. A true and correct copy of the Amended Complaint is attached hereto as **Exhibit 2**. The docket is devoid of the filing of any complaint.

5. A true and correct copy of the Circuit Court, Stafford County’s Case Summary with respect to the State Court Action is attached hereto as **Exhibit 3**.

6. Additional documents filed by Plaintiff in the State Court Action are attached hereto collectively as **Exhibit 4**.

7. Any additional pleadings or orders filed and/or received will be filed via supplement.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: February 12, 2024

REED SMITH LLP

/s/ Amy Sector
Amy Sector